

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

PATRICK KNAUSS

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Criminal No. 24-52

FINAL ORDER OF FORFEITURE

WHEREAS, on October 22, 2024, this Court entered a Judgment and Preliminary Order of Forfeiture against Patrick Knauss, forfeiting the property described below.

AND WHEREAS, pursuant to 21 U.S.C. § 853(n), notice of the Judgment and Preliminary Order of Forfeiture was published on an official government internet site for at least 30 consecutive days, commencing on October 24, 2024, and ending on November 22, 2024.

AND WHEREAS, no third party has petitioned the Court for a hearing to adjudicate the validity of any alleged interest in the property named in the Judgment and Preliminary Order of Forfeiture.

AND WHEREAS, this Court finds, based upon the facts set forth at the defendant's change of plea hearing, which formed the factual basis for the plea, that the defendant had an interest in the property named in the Judgment and Preliminary Order of Forfeiture that is subject to forfeiture, pursuant to 18 U.S.C. § 2253.

ACCORDINGLY, IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

1. All right, title, and interest of all persons, their heirs and assigns, in the property listed in the Judgment and Preliminary Order of Forfeiture entered by this Court on October 22, 2024, and described below, is hereby fully and finally forfeited to the United States of America, pursuant to 18 U.S.C. § 2253:

- a) **one (1) LG Electronics USA, Inc. cell phone, model LM-G900VMY, bearing IMEI# 356040113866368; and**
- b) **one (1) Dell Computer Corporation laptop computer, model Inspiron 17R-5721, bearing serial number CPMY1X1, and internal 1TB Samsung SATA HDD.**

2. All right, title, and interest of all persons, their heirs and assigns, in the property described above, is hereby vested in the United States of America.

3. The government, or its designee, shall dispose of the subject assets listed in paragraph 1 of this Order in accordance with the law and the rules of this Court.

ORDERED this day _____ of _____, 2025.

BY THE COURT:

HONORABLE MARK A. KEARNEY
Judge, United States District Court

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**MOTION OF THE UNITED STATES FOR ENTRY OF
A FINAL ORDER OF FORFEITURE**

The United States of America, by and through its attorneys, Jacqueline C. Romero, United States Attorney for the Eastern District of Pennsylvania, Sarah L. Grieb, Assistant United States Attorney, Chief, Asset Recovery and Financial Litigation Unit, and Kelly Harrell, Assistant United States Attorney, respectfully requests entry of a Final Order of Forfeiture, and in support of this motion, the United States represents as follows:

1. A Judgment and Preliminary Order of Forfeiture was entered by this Court against Patrick Knauss, on October 22, 2024, forfeiting to the United States the following property, pursuant to 18 U.S.C. § 2253:

- a) **one (1) LG Electronics USA, Inc. cell phone, model LM-G900VMY, bearing IMEI# 356040113866368; and**
- b) **one (1) Dell Computer Corporation laptop computer, model Inspiron 17R-5721, bearing serial number CPMY1X1, and internal 1TB Samsung SATA HDD.**

2. The government has complied with the notice provisions of 21 U.S.C. § 853(n). Specifically, the government gave general notice through publication on an official government internet site for 30 consecutive days commencing on October 24, 2024, and ending on November 22, 2024. *See* Exhibit A, attached.

3. The government determined that there are no individuals known to have alleged

an interest in the property subject to forfeiture and who thus would have required direct written notice of the Judgment and Preliminary Order of Forfeiture.

4. No third party has petitioned the Court for a hearing to adjudicate the validity of any alleged interest in the forfeited property, and the time for all third parties to file a petition has expired.

5. Based on defendant's guilty plea, the government avers that the defendant had an interest in the property named in the Judgment and Preliminary Order of Forfeiture that is subject to forfeiture pursuant to 18 U.S.C. § 2253.¹

For the reasons stated above, the government requests that this Court enter the attached Final Order of Forfeiture.

Respectfully submitted,

JACQUELINE C. ROMERO
United States Attorney

SARAH L. GRIEB
Assistant United States Attorney
Chief, Asset Recovery and Financial Litigation Unit

/s/ Kelly Harrell

KELLY HARRELL
Assistant United States Attorney

Date: January 3, 2025

¹ The preliminary order of forfeiture forfeits the defendant's interest in the property and is a conclusive final order as to the defendant's interest in the property. *United States v. Pelullo*, 178 F.3d 196, 202 (3d Cir. 1999); *see also* Fed.R.Crim.P. 32.2(b). The defendant generally has no standing to participate in the ancillary proceeding that takes place after the forfeiture order is entered at sentencing. *Id.*; *see also* Fed.R.Crim.P. 32.2(c); 21 U.S.C. § 853(n)(2) (providing that during ancillary process individuals other than the defendant may assert legal interests in property that has been ordered forfeited to the United States). "This lack of standing suggests that the defendant no longer has an interest in the property" after the entry of the preliminary order of forfeiture. *Pelullo*, 178 F.3d at 202.

Exhibit A

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UNITED STATES OF AMERICA

v.

PATRICK KNAUSS

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Criminal No. 24-52

DECLARATION OF PUBLICATION

In accordance with 21 U.S.C. § 853(n)(1) and Rule 32.2(b)(6)(C) of the Federal Rules of Criminal Procedure, notice of the forfeiture was posted on an official government internet site (www.forfeiture.gov) for at least thirty (30) consecutive days, beginning on October 24, 2024, and ending on November 22, 2024.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on January 2, 2025, in Philadelphia, PA.

/s/ Nathan D. Osberger
NATHAN D. OSBERGER
FSA Forfeiture Law Clerk – Contractor

CERTIFICATE OF SERVICE

The foregoing Motion for an Entry of a Final Order of Forfeiture, and proposed Order will be served electronically through the District Court Electronic Case System upon:

Thomas D. Dreyer, Esquire
tdreyer610@aol.com
Counsel for defendant Patrick Knauss

/s/ Kelly Harrell
KELLY HARRELL
Assistant United States Attorney

Date: January 3, 2025